

ORIGINAL
FILE
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

MAY - 7 1992

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations.)
(Le Sueur and Glencoe, Minnesota))

RM -- _____

To: Mass Media Bureau (Policy & Rules)

PETITION FOR RULE MAKING

Waite Park Broadcasting Company (hereinafter, "Waite Park"), by its attorney, hereby petitions for rule making to amend Section 73.202 of the Commission's Rules as follows.

Waite Park is the permittee for new FM station KQXA on Channel 241A at Le Sueur, Minnesota (File No. BPH-890707MA, granted April 14, 1991), (hereinafter, "KQXA"). The Commission is requested to delete this allotment, allot Channel 241C3 to Glencoe, Minnesota, and modify the KQXA construction permit to specify operation on Channel 241C3 at Glencoe, accordingly. This request is made pursuant to Section 1.420(i) of the rules. In support thereof, the following is shown:

Section 1.420(i) of the Commission's Rules permits an FM radio broadcast station to petition the Commission to amend the FM table of allotments to specify a new community of license for an FM radio station where the new allotment is mutually exclusive with the present allotment. In addition,

the station involved would not risk the loss of its authorization to competing applicants. Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870, 66 RR 2d 827 (1989), (hereinafter "Report and Order I") recon. granted in part, 5 FCC Rcd 7094, 68 RR 2d 644 (1990) (hereinafter "Report and Order II"). Report and Order I identifies three threshold requirements to specifying a new community of license:

- (1) the existing and proposed allotments must be mutually exclusive;
- (2) the new allotment better serves the Commission's allotment priorities; and
- (3) the reallocation of the channel will not deprive the original community of its only existing local transmission service (emphasis supplied).

As will be shown, this request meets each requirement and may, therefore, be granted.

I. ALLOTMENT OF CHANNEL 241C3 AT GLENCOE IS MUTUALLY EXCLUSIVE WITH AN ALLOTMENT OF CHANNEL 241A AT LE SUEUR.

Exhibit 1 hereto, an Engineering Statement prepared by Waite Park's consulting broadcast engineer, Owl Engineering, Inc., shows that Channel 241C3 at Glencoe cannot co-exist with an allotment of Channel 241A at Le Sueur. These communities are 40 Km apart, which is 102 km less than the minimum separation of 142 Km listed in Section 73.207 of the rules.

II. THIS RULE MAKING PROPOSAL WILL BETTER SERVE THE PUBLIC INTEREST AND THE COMMISSION'S ALLOTMENT PRIORITIES.

As described in the attached Exhibit 1, the only suitable transmitter location for Channel 241A at Le Sueur which meets the Commission's spacing rules is a small portion of eastern Sibley County, Minnesota. Waite Park applied on January 8, 1992, to the Sibley County Planning Commission for a conditional use permit to construct a transmitting tower for KQXA. See, Exhibit 2, hereto. On February 3, 1992, the Planning Commission denied Waite Park's request and the request was thereafter referred to the Sibley County Board of Commissioners for further review. On February 25, 1992, the Board of Commissioners affirmed the denial of Waite Park's request. As shown further by Exhibit 1, there are no fully spaced existing antenna towers in the open area.

Waite Park has determined, however, that Channel 241 may be reallocated from Le Sueur to Glencoe and will fully meet the Commission's channel spacing rules. Channel 241A as allocated at Le Sueur is limited in the coverage area and population which it may serve. It is a grandfathered short-spaced channel at 3 kW under Section 73.213(c)(1) of the rules. By allotting Channel 241 to Glencoe and upgrading the Channel to a full Class C3 facility, the Commission will eliminate the short-spacing under Section 73.207 of the rules and provide the first local service to Glencoe as well as a new wide area radio service.

Glencoe is an incorporated city, located in the south central portion of the state, on U.S. Highway 212 and State Highway 22. Its population, according to the 1990 U.S. Census, is 4,648. It has its own Zip Code: 55336, and is the county seat of McLeod County. It is self-governing and has the usual complement of businesses and organizations generally found in communities of its size. According to information published by the Glencoe Chamber of Commerce, the community has seven churches, two elementary schools, one high school, one middle school, a Catholic parochial school which accepts children through the sixth grade and a Lutheran parochial school which accepts children through the eighth grade.

Glencoe has its own 40 person fire department, an ambulance service, police department, sheriff's department, and numerous community and civic organizations, including Jaycees, Lion's Club, a VFW Post and Auxiliary, an American Legion, a local theater group and senior citizens groups. Glencoe also has a medical clinic, a 55 bed hospital and a newspaper.

In addition, 1990 U.S. Census records show that Glencoe's population (4,648) is approximately 20% larger than Le Sueur's (3,714). As further shown by the attached engineering statement, Channel 241C3 from Glencoe will serve an area of 4,809 square kilometers and a population of 88,129 while Channel 241A at Le Sueur will serve an area of 1,859 square kilometers and a population of 31,905 people. Therefore,

allotting Channel 241C3 to Glencoe will create a coverage area increase of about 176% square kilometers and 159% more people. Neither Le Sueur nor Glencoe are located within an urbanized area. They are two rural communities located in adjacent counties.

There is no broadcast facility currently licensed to Glencoe. This rule making will thus provide a first local service to Glencoe. The attached Engineering Statement shows that Channel 241C3 may be allotted to Glencoe fully consistent with all spacing requirements from an assumed transmitter site located at 44° 46' 09"; 94° 09' 05", without requiring any other changes in the Table of Allotments except deleting Channel 241A from Le Sueur.

Deleting the allotment of Channel 241A from Le Sueur will not deprive its residents of significant broadcast service. Exhibit 1 shows that four FM stations serve Le Sueur with a 60 dBu coverage contour, while only one FM station serves Glencoe with a 60 dBu contour.

In addition, AM station KRBI St. Peter, Minnesota, (hereinafter "KRBI"), encompasses Le Sueur within its 2 mV/m signal contour. KRBI provides significant programming directed toward the needs of Le Sueur, has served St. Peter and Le Sueur since 1957, and has maintained a full time studio and office within the city limits of Le Sueur since 1959. Exhibit 3, attached hereto, is a compendium of letters from Le Sueur civic and business leaders describing the service KRBI

provides to Le Sueur. As demonstrated by these letters, Le Sueur is well-served by an existing station. The public interest will not be harmed by reallocating an unbuilt facility on Channel 241C3 to Glencoe.

This petition presents a proposal which will create a more equitable distribution of broadcast service and a more efficient use of the broadcast spectrum. The public interest and the Commission's allotment priorities will be served by a grant of this petition.

III. WAITE PARK'S PROPOSAL WILL NOT DEPRIVE LE SUEUR OF AN "EXISTING SERVICE."

In its Report and Order II, the Commission reiterated that a reallocation must not deprive a community of an "existing service." In addition, the Commission recognized at paragraph 19 and footnote 16 of Report and Order II that for purposes of Section 1.420(i) of the rules the phrase, "existing service," excludes bare construction permits. See, also, Farmington and Gallup, New Mexico, DA 92-436, released April 16, 1992, and, Greenfield and Del Rey Oaks, California, 6 FCC Rcd 631, n. 6 (Mass Media Bur. 1991) (application for construction permit does not constitute "existing service" for purposes of Section 1.420(i)).

KQXA is an unbuilt station. In addition, Waite Park was not awarded its construction permit for KQXA as the result of comparative administrative hearing. Accordingly, Waite Park is not required to operate the station for a period of one

year prior to making a change in its community of license. See, e.g., Report and Order II, Id. paragraph 21.

Pursuant to Section 1.420 of the Rules, no competing expressions of interest to the Glencoe allotment will be permitted. As further shown by Exhibit 1, there are no other fully spaced commercial allocations available for Glencoe.

When Channel 241C3 is allotted to Glencoe, Waite Park will promptly file an appropriate application to modify KQXA. Upon grant thereof, Waite Park will construct the modified facilities promptly.

SUMMARY

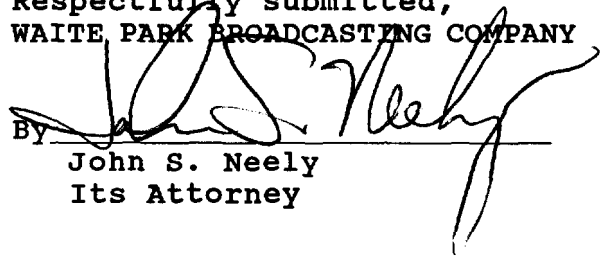
Waite Park has attempted to construct KQXA on Channel 241A at Le Sueur, Minnesota. However, rulings by the Sibley County Planning Commission and the Sibley County Board of Commissioners prohibit Waite Park from constructing an acceptable fully spaced tower site for Channel 241A at Le Sueur.

There are no existing towers available to Waite Park which are fully spaced and would provide the required city-grade signal over Le Sueur. Reallotting Channel 241 from Le Sueur to Glencoe and modifying the permit of unbuilt station KQXA to specify Channel 241C3 at Glencoe will resolve this matter in the public interest, as described above. Waite Park has met the threshold prerequisites for set forth in the Report and Order I & II.

Accordingly, section 73.202(b) of the rules should be amended as follows:

<u>CITY</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Le Sueur, Minnesota Glencoe, Minnesota	241A	241C3

Respectfully submitted,
WAITE PARK BROADCASTING COMPANY

By 
John S. Neely
Its Attorney

May 7, 1992

Miller & Miller, P.C.
P.O. Box 33003
Washington, DC 20033



OWL ENGINEERING, INC.

CONSULTING COMMUNICATIONS ENGINEERS

**1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502**

**ENGINEERING STATEMENT IN SUPPORT OF
CHANGE OF COMMUNITY OF LICENSE
ON BEHALF OF
WAITE PARK BROADCASTING COMPANY
GLENCOE, MINNESOTA**

April 3, 1992

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**ENGINEERING STATEMENT
ON BEHALF OF WAITE PARK BROADCASTING COMPANY
IN SUPPORT OF A PETITION TO CHANGE
THE COMMUNITY OF LICENCE
CHANNEL 241 C3 TO GLENCOE, MINNESOTA**

Owl Engineering, Inc. has been retained by WAITE PARK BROADCASTING COMPANY (hereafter "WAITE") to prepare this Engineering Statement in support of a petition to change the city of license of channel 241 at Le Sueur, Minnesota as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Le Sueur, MN	241A	
Glencoe, MN		241C3

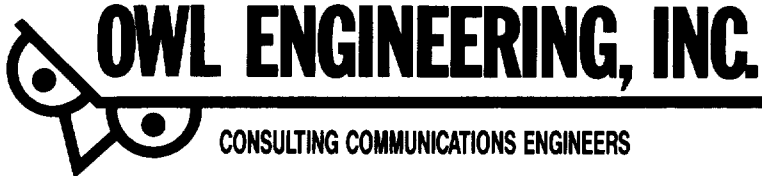
The reference coordinates used for Glencoe in this study are:

44 46' 09" North Latitude
94 09' 05" West Longitude

The reference coordinates used for Le Sueur in this study are:

44 29' 08" North Latitude
94 00' 09" West Longitude

The reference coordinates for Glencoe are based on center city. The reference coordinates for Le Sueur are based on a site restriction 7.5 kilometers North West of town.



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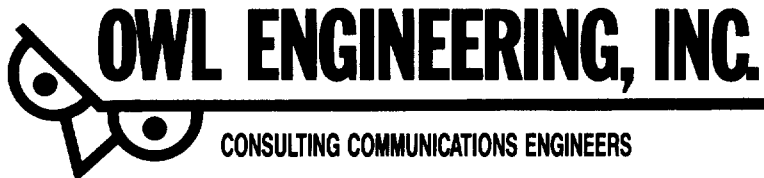
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**ENGINEERING STATEMENT IN SUPPORT OF
CHANGE OF COMMUNITY OF LICENSE
ON BEHALF OF
WAITE PARK BROADCASTING COMPANY
GLENCOE, MINNESOTA**

This engineering statement was prepared on behalf of WAITE PARK BROADCASTING COMPANY in support of a Change of Community of License for channel 241A at Le Sueur, MN to channel 241C3 at Glencoe, MN.

TOWER LOCATIONS

An engineering study was performed to determine if any suitable tower locations could be found for channel 241A at Le Sueur. First, a channel allocation study was performed to determine the permissible area to locate a transmitter site and meet FCC spacing and city coverage requirements. That study is included as Engineering Exhibit E-1. Channel 241A at Le Sueur is Grandfathered pursuant to FCC Rules Section 73.213(c)(1) to 3,000 watts Effective Radiated Power (ERP) at 100 meters Height Above Average Terrain (HAAT). In no instance would it be possible to locate a transmitter site utilizing the separation requirements of Section 73.207 (6,000 watts ERP Class A criteria). Due to the required protection afforded to stations located at Faribault and North Mankato, the available area is a small portion of Eastern Sibley County. Engineering Exhibit E-2 depicts the open area in which to locate a transmitter location. Attempts have been made to secure a proper zoning permit but the Sibley County Board is not willing to approve any broadcast towers at this time. Because of this fact, an extensive search was conducted to find an existing tower to locate a transmitting antenna. No towers were found in the open area



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**ENGINEERING STATEMENT IN SUPPORT OF
CHANGE OF COMMUNITY OF LICENSE
ON BEHALF OF
WAITE PARK BROADCASTING COMPANY
GLENCOE, MINNESOTA**

that would be suitable for broadcast purposes. (Note: Several towers were located in the Le Sueur area but none of them were located in the open area.)

An allocation study was performed for the Glencoe area and it was determined that a regional Class C3 facility could be constructed. The results of that study are included as Engineering Exhibit E-3. Based on the allocation study results, it was determined that a large area in which to locate a transmitter is available. The area to locate is depicted in Engineering Exhibit E-4. At the present time, there are five towers within the open area that would be suitable for broadcast purposes.

POPULATION AND AREA DATA

The allotment of the higher class channel to Glencoe was evaluated to determine the amount of increase in service area and population served. In determining the service areas, it was assumed both stations utilized the maximum allowed ERP and HAAT for the reference class of the station. The predicted service area for Class C3 facilities at Glencoe would cover 4,809 square kilometers. The predicted service area for Class A facilities at Le Sueur would cover 1,859 square kilometers. (Area was calculated by use of a computerized integration program.) A study to determine the additional population served by the higher class channel was completed. It was determined that 88,129 persons would be served by the 60 dBu coverage contour by the Class C3 facilities at Glencoe. The Class A facilities at Le Sueur



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**ENGINEERING STATEMENT IN SUPPORT OF
CHANGE OF COMMUNITY OF LICENSE
ON BEHALF OF
WAITE PARK BROADCASTING COMPANY
GLENCOE, MINNESOTA**

would serve 31,905 persons. It can be concluded that the allotment of the higher class channel to Glencoe would increase the area served by 159% and the population served by 176%.

COMMUNITY OF LICENSE

At present, channel 241A is the only broadcast station allocated to Le Sueur. However, Engineering Exhibit E-5 is a plot showing the City Grade contour of KRBI and demonstrates that Le Sueur is completely encompassed by the 2 mV/m contour.



**ENGINEERING STATEMENT
ON BEHALF OF CLIENT NAME
IN SUPPORT OF A PETITION TO CHANGE
THE COMMUNITY OF LICENCE
CHANNEL 241 C3 TO GLENCOE, MINNESOTA**

A database search was conducted to determine what stations, if any, were providing service to Le Sueur. The results of that search are contained in Engineering Exhibit E-6. This search indicated that at present four different stations are predicted to provide a 60 dBu coverage contour over all of Le Sueur. The stations providing the coverage are:

KXLP	New Ulm, MN	Channel 226C1
VACANT	Faribault, MN	Channel 298C2
KYSM	Mankato, MN	Channel 278C1
KMSU	Mankato, MN	Channel 209C2

The same computer database search was conducted to determine the stations that are currently providing a 60 dBu coverage contour to Glencoe. The results of this search are provided in Engineering Exhibit E-7. The search showed that only one station provided a 60 dBu coverage contour to Glencoe. This station is KGAC in St. Peter, MN on channel 213C1.

Based on the results of these two computer searches, it can be seen that Glencoe, MN is presently under-served in the ability of local residents to have access to reception of any 60 dBu commercial broadcast signals.

The proposed Class C3 facility will fill the present void in providing a regional commercial broadcast facility to the Glencoe, MN area.



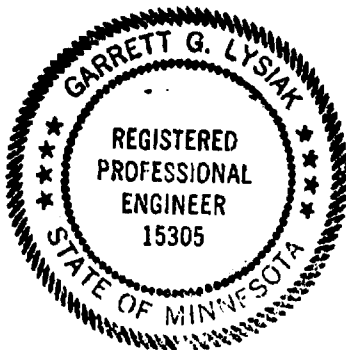
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Engineering Statement

This Engineering Statement was prepared for Waite Park Broadcasting in support of a petition to change the community of license to Glencoe, Minnesota on channel 241 C3 from Le Sueur, Minnesota. A complete commercial band frequency allocation study was performed using the center city coordinates of Glencoe, Minnesota. The results of that study indicate that at present no other channel is available for a commercial allocation in the Glencoe, Minnesota area. This study considered all classes of commercial allocations ranging from Class A to Class C.



Respectfully Submitted,

Garrett G. Lysiak

Garrett G. Lysiak, P.E.

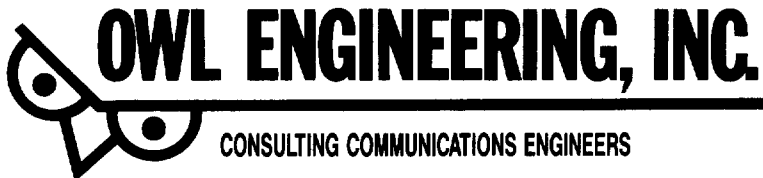
August 20, 1991



**ENGINEERING STATEMENT IN SUPPORT OF
CHANGE OF COMMUNITY OF LICENSE
ON BEHALF OF
WAITE PARK BROADCASTING COMPANY
GLENCOE, MINNESOTA**

CONCLUSIONS

- 1) There is no available site to locate a transmitting facility at Le Sueur due to zoning restrictions in Sibley County and the lack of existing structures.
- 2) There is a large available area to locate a transmitting facility at Glencoe.
- 3) The higher class channel at Glencoe will increase the coverage area by 159%.
- 4) The higher class channel at Glencoe will increase the population served by 176%
- 5) KRBI will provide local aural transmission service to Le Sueur.
- 5) Channel 241C3 will provide Glencoe with it's first aural transmission service.



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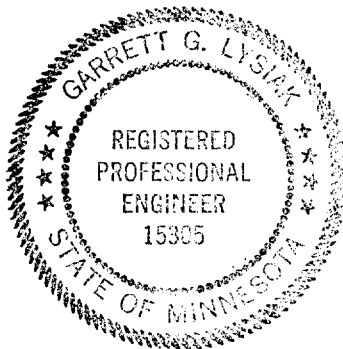
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**ENGINEERING STATEMENT IN SUPPORT OF
CHANGE OF COMMUNITY OF LICENSE
ON BEHALF OF
WAITE PARK BROADCASTING COMPANY
GLENCOE, MINNESOTA**

AFFIDAVIT

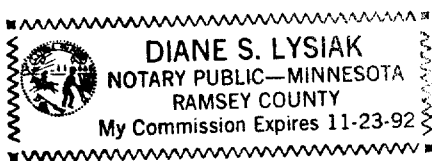
RAMSEY COUNTY)
)
STATE OF MINNESOTA) **ss:**

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



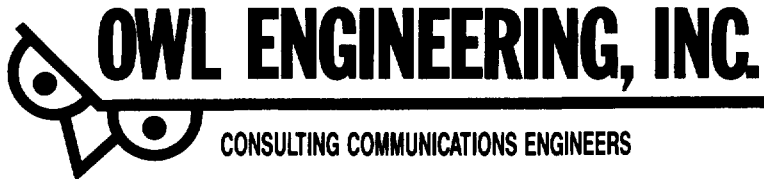
Garrett G. Lysiak
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date April 3, 1992



Diane S. Lysiak
Diane S. Lysiak
Notary Public

My commission expires November 23, 1992



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ENGINEERING EXHIBIT E-1

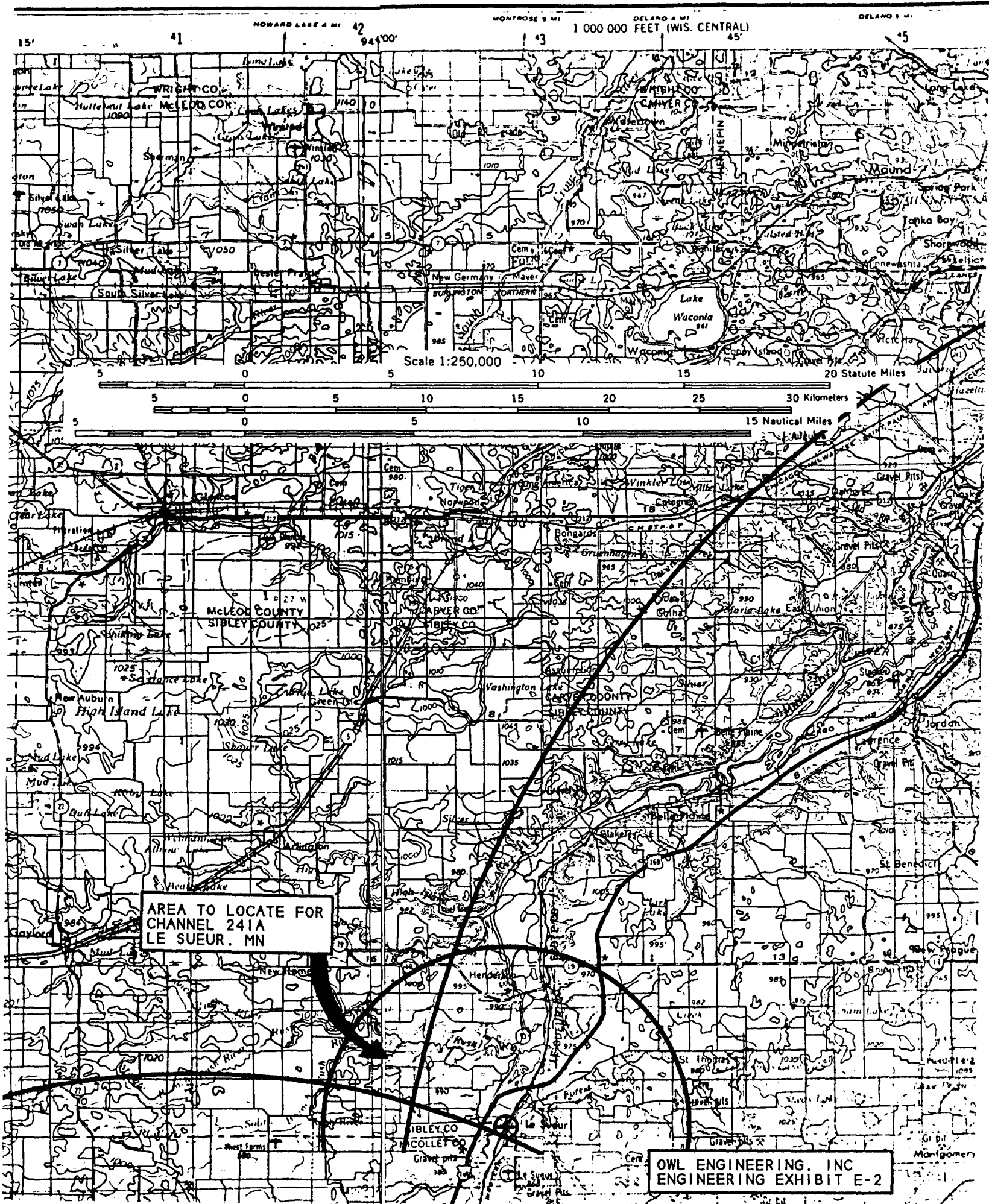
CHANNEL SPACING STUDY LE SUEUR, MN

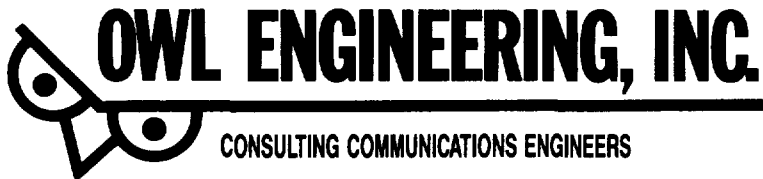
FM Channel 241-A

LATITUDE: 44° 29' 8"
LONGITUDE: 94° 0' 9"

CHNL Call	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing °
295	NO CONFLICT					
294	NO CONFLICT					
238	KCHKFM FMMN New Prague	A	33.28	27	6.28	94.50
238	FAMN New Prague	A	28.73	27	1.73	90.92
239	NO CONFLICT					
240	FAMN Faribault	A	66.12	64	2.12	102.24
240	FAIA Estherville	C2	132.18	105	27.18	221.50
240	KQCL FMMN Faribault	A	66.12	64	2.12	102.24
240	KQCL FMMN Faribault	A	66.12	64	2.12	102.24
240	KILRFM FMIA Estherville	C2	132.47	105	27.47	221.59
241	FAMN Albert Lea	A	106.00	105	1.00	151.22
241	KKSR FMMN Sartell	A	128.17	105	23.17	354.04
241	KKSR FMMN Sartell	A	128.17	105	23.17	354.04
241	KQPR FMMN Albert Lea	A	115.48	105	10.48	146.60
242	NO CONFLICT					
243	NO CONFLICT					
244	FAMN North Mankato	C3	42.90	42	0.90	193.75
244	KDOG FMMN North Mankato	A	30.66	27	3.66	197.38
244	KDOG FMMN North Mankato	A	30.66	27	3.66	197.38

NL JERN UNITED STATES 1:250,000





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ENGINEERING EXHIBIT E-3

CHANNEL SPACING STUDY GLENCOE, MN

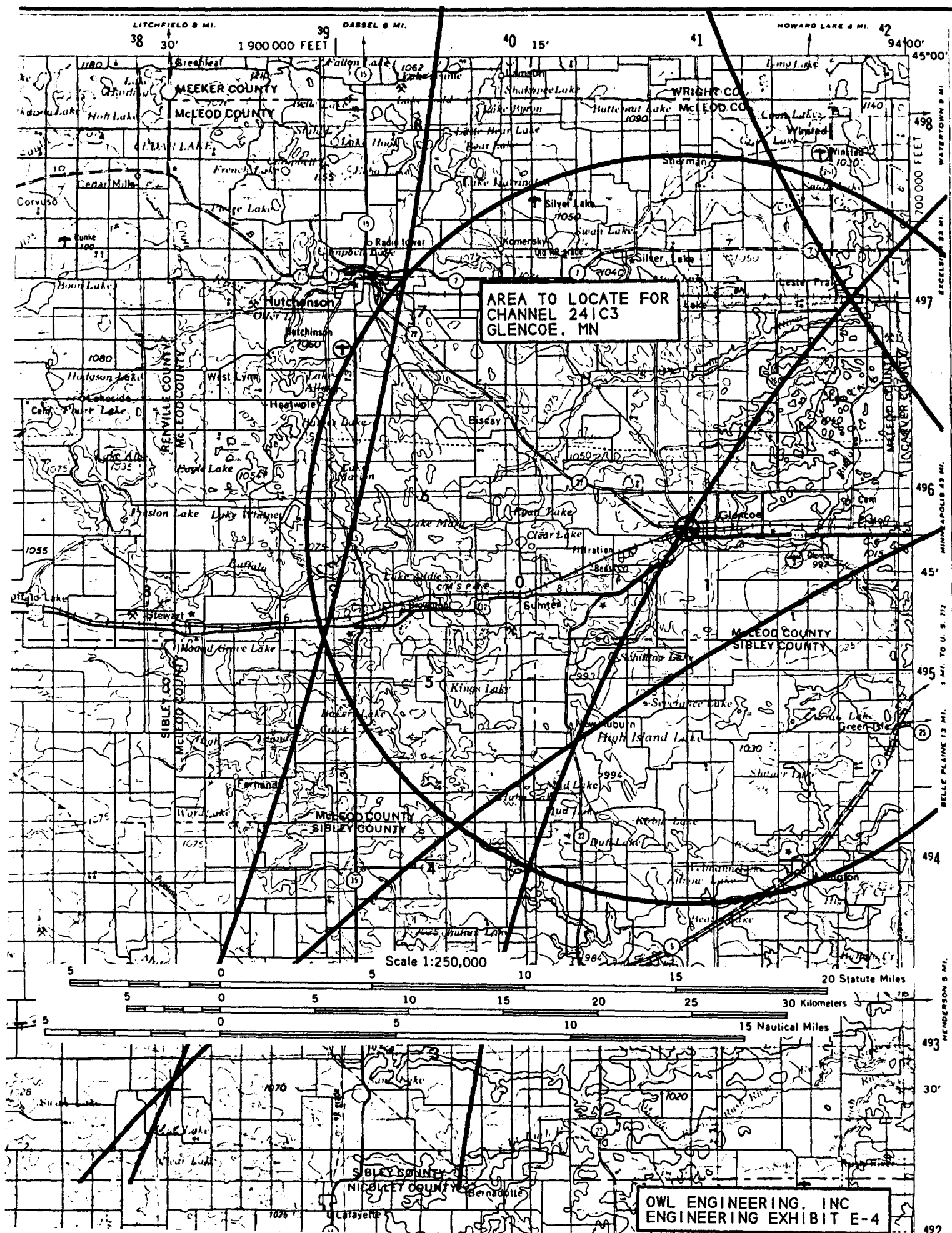
FM Channel 241-C3

LATITUDE: 44° 46' 9"
LONGITUDE: 94° 9' 5"

CHNL Call	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing °
295	NO CONFLICT					
294	NO CONFLICT					
238 KCHKFM	FMMN New Prague	A	56.45	42	14.45	127.19
238	FAMN New Prague	A	51.62	42	9.62	128.28
239	NO CONFLICT					
240	FAMN Faribault	A	88.93	89	-0.07	120.75
240	FAMN Forest Lake	A	103.12	89	14.12	55.05
240	FAIA Estherville	C2	150.88	117	33.88	210.04
240 KQCL	FMMN Faribault	A	88.93	89	-0.07	120.75
240 KQCL	FMMN Faribault	A	88.93	89	-0.07	120.75
240 WLKXFM	FMMN Forest Lake	A	103.12	89	14.12	55.05
240 KILRFM	FMIA Estherville	C2	151.13	117	34.13	210.14
241 KIXX	FMSD Watertown	C1	228.24	211	17.24	282.44
241	FASD Watertown	C1	234.50	211	23.50	273.79
241	FAMN Albert Lea	A	139.38	142	-2.62	153.13*
241 KQPR	FMMN Albert Lea	A	148.47	142	6.47	149.41
241 KIXX	FMSD Watertown	C1	234.50	211	23.50	273.79
241 KKSR	FMMN Sartell	A	95.96	142	-46.04	358.96**
242	NO CONFLICT					
243	NO CONFLICT					
244	FAMN North Mankato	C3	73.20	43	30.20	178.68
244 KDOG	FMMN North Mankato	A	60.84	42	18.84	177.46
244 KDOG	FMMN North Mankato	A	60.84	42	18.84	177.46
244 KDOG	FMMN North Mankato	C3	60.84	43	17.84	177.46

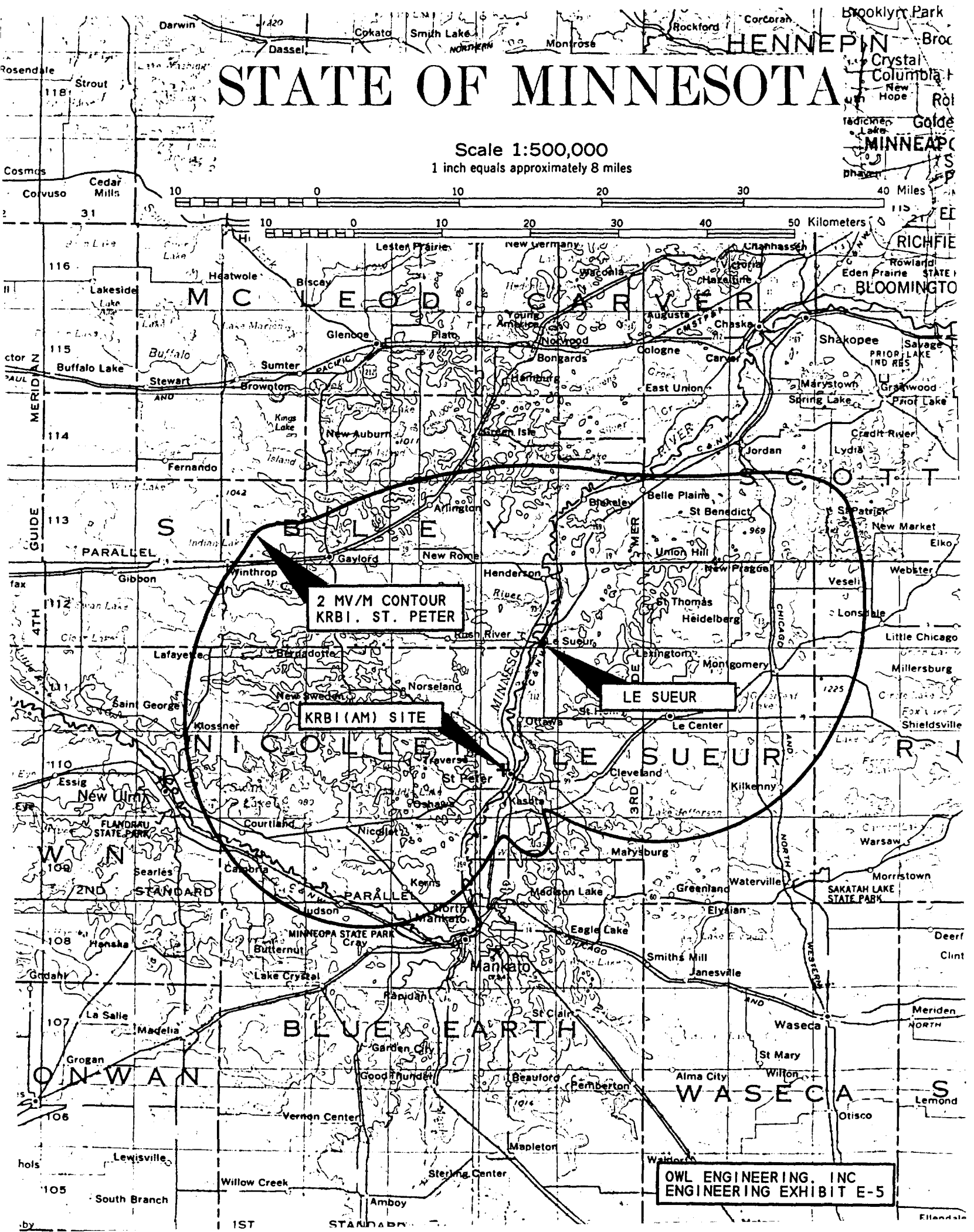
* KQPR at Albert Lea is a Licensed station, the allocation record does not require protection

** KKSR has been ordered to channel 244C2 per D88-333.

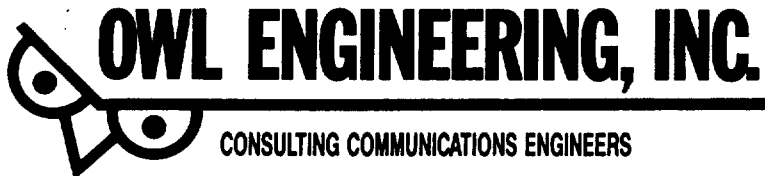


STATE OF MINNESOTA

Scale 1:500,000
1 inch equals approximately 8 miles



OWL ENGINEERING, INC
ENGINEERING EXHIBIT E-5



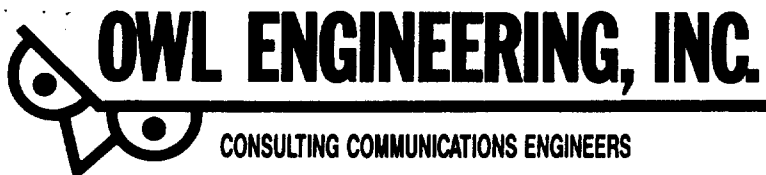
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ENGINEERING EXHIBIT E-6
ON BEHALF OF WAITE PARK BROADCASTING COMPANY
IN SUPPORT OF A PETITION TO CHANGE
THE COMMUNITY OF LICENCE
CHANNEL 241 C3 TO GLENCOE, MINNESOTA

Reference Coordinates: 44-46- 9 Latitude 94- 9- 5 Longitude

Call City	Auth	Licensee St.	Chan. Freq.	ERP Kw	HAMSL(m) HAAT (m)	Latitude Longitude	Br-to	Dist (km)
	USE		235C2	0.000	0.0	45-13-37	325.1	62.2
Litchfield		MN	94.9		0.0	94-36-20		
KYRS	LIC	Crow River Broadca	231A	3.000	456.0	45- 4-24	305.6	58.5
Atwater		MN	94.1		100.0	94-45-20		
KCHKFM	CP	Kingsley H. Murphy	238A	3.000	418.0	44-27-41	127.2	56.5
New Prague		MN	95.5		100.0	93-35- 8		
KRBIFM	LIC	Johnson Broadcasti	288A	3.000	332.0	44-19-41	163.7	51.1
St. Peter		MN	105.5		40.0	93-58-17		
KGAC	LIC	Minnesota Public R	213C1	75.0	504.0	44-13-20	177.5	60.8
St. Peter		MN	90.5		216.0	94- 7- 3		
KVRU	CP	Minnesota Public R	218C2	8.500	471.0	44-13-20	177.5	60.8
St. Peter		MN	91.5		183.0	94- 7- 3		
	VAC		289A	0.000	0.0	44-51- 6	79.8	53.4
Eden Prairie		MN	105.7		0.0	93-29-12		
KMXK	LIC	Litchfield Broadca	237A	3.000	443.0	45- 7- 2	320.9	50.0
Litchfield		MN	95.3		91.0	94-33-13		
KKJR	APP	North American Bro	296A	4.400	394.0	44-54-24	312.1	22.9
Hutchinson		MN	107.1		61.0	94-21-59		
KOLV	LIC	Olivia Broadcastin	269A	3.400	416.0	44-45-51	269.8	61.6
Olivia		MN	101.7		85.0	94-55-45		
KDOG	CP	River Bend Radio,	244A	1.350	483.0	44-13-20	177.5	60.8
North Mankato		MN	96.7		195.0	94- 7- 3		



CONSULTING COMMUNICATIONS ENGINEERS

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ENGINEERING EXHIBIT E-7
ON BEHALF OF WAITE PARK BROADCASTING COMPANY
IN SUPPORT OF A PETITION TO CHANGE
THE COMMUNITY OF LICENCE
CHANNEL 241 C3 TO GLENCOE, MINNESOTA

Reference Coordinates: 44-29- 8 Latitude 94- 0- 9 Longitude

Call City	Auth	Licensee St.	Chan. Freq.	ERP Kw	HAMSL(m) HAAT (m)	Latitude Longitude	Br-to	Dist (km)
VAC North Mankato		MN	244C3 96.7	0.000	0.0 0.0	44- 6-38 94- 7-49	193.7	42.9
KCHKFM New Prague	CP	Kingsley H. Murphy MN	238A 95.5	3.000	418.0 100.0	44-27-41 93-35- 8	94.5	33.3
KRBIFM St. Peter	LIC	Johnson Broadcasti MN	288A 105.5	3.000	332.0 40.0	44-19-41 93-58-17	172.0	17.7
VAC Faribault		MN	298C2 107.5	0.000	0.0 0.0	44-14-14 93-23-41	119.5	55.8
KGAC St. Peter	LIC	Minnesota Public R MN	213C1 90.5	75.0	504.0 216.0	44-13-20 94- 7- 3	197.4	30.7
KVRU St. Peter	CP	Minnesota Public R MN	218C2 91.5	8.500	471.0 183.0	44-13-20 94- 7- 3	197.4	30.7
KXLP New Ulm	LIC	James Ingstad Broa MN	226C1 93.1	100.0	440.0 149.0	44- 7-44 94-11-15	200.4	42.3
VAC Eden Prairie		MN	289A 105.7	0.000	0.0 0.0	44-51- 6 93-29-12	44.9	57.7
KKJR Hutchinson	APP	North American Bro MN	296A 107.1	4.400	394.0 61.0	44-54-24 94-21-59	328.6	55.0
KYSMFM Mankato	LIC	F.B.Clements & Co. MN	278C1 103.5	81.0	452.0 162.0	44-10-20 94- 2-23	184.9	34.9
KMSU Mankato	LIC	Mankato State Univ MN	209C2 89.7	20.0	414.0 122.0	44- 8-34 94- 0- 8	180.0	38.1
KDOG North Mankato	CP	River Bend Radio, MN	244A 96.7	1.350	483.0 195.0	44-13-20 94- 7- 3	197.4	30.7

EXHIBIT 2